



Appendix B: Top Ten Issues Detailed Analysis

Contact Information

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Data Quality Mad Dog Information

Mad Dog Issue Number: 3	
Business Entities Affected: Aid	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

There is no enterprise way to uniquely identify an aid award (loan or grant). For example, COD has established an Award ID for PELL Grants and Direct Loans (combination of SSN, Loan Type, Academic Year, School ID, and Promissory Note number - 999999999SYYG999999001), NSLDS matches on five key fields, and the FFEL community is moving towards utilizing a set of rules commonly known as the Common Line ID. As such, a single integrated view of the loan across the enterprise is not readily available. Also, with systems using various methods to uniquely identify loans, there is a greater potential for duplicate loan records to be created, causing the history of the loan across systems to become fragmented or difficult to trace.

Currently the most critical issue for loan identification is related to FFEL consolidated loans. When reporting a consolidated loan to NSLDS, there are no requirements for Guaranty Agencies to identify the underlying loans. These underlying loans may be of varying types and programs such as subsidized, unsubsidized, Title VII HHS, Title IV Perkins, etc. Without knowing these details, the breakdown of the underlying loans must be estimated when calculating the student's aggregate loan limits (unsubsidized or subsidized). Using estimates often results in these limits being erroneously calculated.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

The key criterion for an award ID is for it to be unique. Uniqueness can be established simply by using sequential numbers or random characters. However, it is recommended that a common award ID is created that uses a number of basic fields to ensure uniqueness. These fields should include the corresponding person, institutions (school and financial institution), and other pertinent information such as program, loan type, academic year, and promissory note number. Using these fields would allow the various trading partners that create loan IDs, to more readily adopt the standard.

The establishment of a common award ID is an enterprise-wide endeavor and would affect FSA's trading partners as they conform to the standard. Initially, it is recommended that the ID be established internally with a cross walk tying the common award ID to external award identifiers. However, to reap the greatest benefits, all of the trading partners should eventually be required to adhere to the same standard.

In order to ensure the underlying loans for FFEL Consolidations are identified, it is recommended that policy changes are implemented requiring Guaranty Agencies to report all of the consolidation's underlying loans.

With the continual changes in the FSA landscape (i.e. COD, NSLDS II, Common Servicing for Borrowers, etc.), there is the need for determining the timeline and sequencing plan for integrating the common award ID into the FSA landscape. The scope of work for establishing a common award ID is in proportion to that of the SSIM and RID efforts. As such, an in-depth research and analysis is required to ensure a viable solution is selected. The following two phased effort is recommended:

- 1) Current State Analysis -
 - Further Refine Vision and Scope
 - Define Goals and Objectives
 - Document Current State
 - Checkpoint with FSA business owners
- 2) Solution Determination and Planning -
 - Document candidate Award ID Solutions
 - Document candidate Award ID Implementation Methods
 - Identify sequencing and initial candidate FSA systems
 - Conduct working sessions to analyze and select the solution
 - Develop enterprise High Level Design and Implementation Approach based on the selected solution



3. What business areas does this initiative impact?

The Lifecycle Stages affected include Application, Delivery, Institution and Servicing
The systems and trading partners impacted by the implementation of a common award ID solution are COD, DLSS, DLCS, DMCS, CDDTS, CMDM, DLDM, OCTS 2.0, FMS, NSLDS, Schools, Lenders, and GAs.

4. What additional data quality issues (if any) are addressed by this recommendation?

NA

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

As part of analytics and reporting, FSA's systems not only rely on consistent recognition of persons and institutions but also on the accurate identification of those persons and institutions' aid awards. Establishing a RID and SSIM will provide the consistent recognition of persons and institutions, however without a common award ID, it may be difficult to track a loan across all systems and to see the complete single integrated enterprise view of the loan. A common award ID would establish the framework by which FSA can consistently identify awards, across all phases of the student aid lifecycle. Such consistency will contribute to greater customer data integrity.

A common award ID interface field will provide a consistent initial point of validation for all award information reported to FSA and help to reduce the occurrence of duplicate loan records being created.

Lack of a common award ID also adds another complexity to the collections and consolidation process. A common loan ID would allow both FSA and its external partners to more readily identify the loan type and the borrower and institution who originated the loan. For FFEL Consolidated Loans, without the underlying loan detail there will continue to be loan limits incorrectly calculated and time and money spent researching to make corrections.



Additional Comments

NCHELP is facilitating the move of FFEL participants to the Common Line ID, however not all partners are using the field established as the loan identifier and those that are using it are not always using the same ID for the same loan. For example, a lender may have one ID, when the lender sends the loan to the GA the GA may create a new ID, and then if the loan is transferred to another GA, that GA may also create a new ID.



Contact Information

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Data Quality Mad Dog Information

Mad Dog Issue Number: 4	
Business Entities Affected: Aid & Financial Partner	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

When a borrower fails to make payments for 270 days on a loan, they go into default. For defaulted FFEL loans, stewardship of the loan is transferred from the Lender to the Guaranty Agency (GA). After making a claim via the Forms 2000, the GA attempts to collect on the loan for a period (often four to five years). If the GA is unable to collect, they assign the loan to FSA by sending it to the Debt Management Collection System (DMCS). During the unassigned period while the GA holds the loan for collections, they are required to continue reporting the loan information to FSA via the NSLDS interface. Currently the level of reasonability and accuracy of this information is unclear, and the definitions and fields being reported are not consistent (e.g. Not all GA collection fees reported on the Form 2000 are reported in the details sent to NSLDS).

Also, since the GA is paid its original claim according to the Form 2000 rather than the NSLDS detailed data, there is less incentive to correct or update records rejected by NSLDS due to invalid data fields. If the GA is unable to collect on the loan, these incorrect records and data deficiencies have the potential to be passed on to DMCS. Furthermore, the process of assigning the defaults to DMCS is different for each GA and is handled in an ad hoc fashion, resulting in varying levels of quality and completeness for this data.

Another part of this issue concerns the accounting of the receivables established as part of the Forms 2000. The unassigned loans reported to NSLDS are also reported at the summary level to FMS on the Forms 2000. The Guaranty Agencies currently report only the reinsurance payment amount on the Forms 2000. For example, for a 98% insurance rate and a 95% reinsurance rate if there is \$100 in defaulted loans, \$98 is paid to the Lender by the GA, and \$93.1 (the \$98 X 95%) is invoiced by the GA to FSA on the Forms 2000. As such, the receivable is initially booked as \$93.1 rather than \$100. When the loans are assigned to FSA via DMCS the booked receivable then needs to be adjusted to the \$100. However, since reinsurance rates have changed over the years and the summarized Form 2000 data does not provide this cohort information, the adjustment must be estimated and is not always correct.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

The first step in addressing this issue is to determine what the current level of reasonability is for the detailed data in NSLDS as compared to the summary data reported to FMS on the Form 2000 and what the acceptable threshold is for the differences. There have been efforts to analyze the reasonability on an annual basis and there have been apparent improvements in the quality of the data. However, there needs to be a more detailed analysis to determine the reasons for the differences (e.g. missing data, frequency, inaccurate data, inconsistent data definitions, etc.). This effort has begun and there currently is a task order where FSA is working with the current NSLDS subcontractor to understand the differences at a more detailed level and to establish reasonability criteria for a monthly basis.

With methods such as the NSLDS Reasonability check, cross-system reconciliation issues can be mitigated, however multiple entries points and data stores for the same data makes it difficult to completely eliminate the issues. For a more comprehensive solution it is recommended that GA FFEL default claims and collections reinsurance data ultimately reside in a central repository with one entry point to FSA. The NSLDS system currently provides the best option for this solution, however a detailed analysis should be conducted to ensure the definitions of what is being reported to NSLDS are consistent among Guaranty Agencies and the reported data provides the information required for all FSA functionality (NSLDS, DMCS and FMS). Furthermore, future NSLDS/Enterprise Data Warehouse re-designs must be considered when establishing an implementation sequencing plan.

After receiving the FFEL claims and collections details from the GA, NSLDS would pass the summarized data to FMS, allowing FMS to calculate the GA reinsurance claim payment based on cohort data and to establish an accurate 100% level, collections receivable. The Guaranty Agencies would continue to send in the current Form 2000, however the FFEL default claims and collections reinsurance fields would not need to be entered. For viewing purposes, these fields could be auto-populated by FMS using the summarized data received from NSLDS. With the GA's claim payments based on their reported loan level details there will be greater incentive to correct and update records rejected by NSLDS.

To implement the "GA to NSLDS, single entry point" solution a consolidated interface format is recommended. With the current FFEL and internal XML efforts, an XML interface should be considered. XML would allow FSA to verify the required core data blocks are reported consistently by each GA. Commonly-defined XML Core Components and XML-based tools also would enable the cleanup of the existing inaccurate FFEL default data. Furthermore, XML-based data modeling for the GA interfaces would provide system flexibility to simplify future interface changes and support new application and data exchange requirements.

It is also recommended that FSA give increased emphasis to the A133 Compliance Audits performed by external auditors for Guaranty Agencies. These audits verify the validity of the reinsurance claim and collections data sent by the Guaranty Agencies.



3. What business areas does this initiative impact?

Servicing is the key stage of the Enterprise Life Cycle affected by this issue. The quality of the analytics and reporting are impacted for a number of systems and personnel including: Researchers, OMB, GAO, CFO, NSLDS, FMS, and DMCS.

4. What additional data quality issues (if any) are addressed by this recommendation?

Mad Dog Issue #23 *"The FFEL data reported to NSLDS by the GA submitters is not reported at a consistent time interval to enable quality analytics. For example, data comes from multiple GAs at varying times of the month, with varying financial close dates; this makes the picture of FFEL data inconsistent and hard to analyze."* This issue also is related to GAs reporting information to FSA. As such, Issue #23 should be considered when implementing any policies or interfaces in response to Issue #4.

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

(Reasonability Study only)

>\$500,000

(Entire Solution)

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

(Reasonability Study only)

>12 months

(Entire Solution)

7. What are the impacts of not addressing this issue?

At the beginning of fiscal year 2003 there were approximately \$15 Billion in defaulted unassigned FFEL loans being collected on by GAs. There currently is approximately another \$9 Billion assigned to FSA. An inaccurate view of this data may provide flawed analytics and reporting and add to the complexity of the collections process. The following are the key areas of concern:

- The Financial Reporting used to make management decisions may be inaccurate.
- Reports and information used by policymakers for modeling and performing trend analysis may be flawed.
- Inaccurate analytics to determine Forms 2000 Reasonability may not readily highlight issues for specific institutions or locations, making it difficult to target GAs for review.
- It may also be difficult to provide auditors with an assurance that the financial statement balances are reasonable.



Additional Comments

N/A



Contact Information

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Data Quality Mad Dog Information

Mad Dog Issue Number: 5	
Business Entities Affected: School	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

Today, as a normal course of business, the Application system (CPS) receives updates from the Origination and Disbursement System (COD) regarding the disbursement of Direct Loan and Pell awards for attendees at various institutions on a periodic basis (quarterly). The Application system uses these updates to designate applicants that need to be verified by the school. They also reflect the attendance of a student at a particular institution and indicate that communication to other institutions on behalf of that student may no longer be necessary.

The application process would be enhanced by receiving these disbursements more frequently, real-time if possible. This would reduce the number of extraneous communications (ISIRs, etc.) to schools that no longer need information about a student who will not be attending their institution.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

This issue can be resolved in a number of ways, the most thorough of which is to consolidate the data used during Application with the data used in the Origination and Disbursement business process into a single data store. In doing so, the flow of information regarding disbursements would be inherently available to the application business logic and make retransmission or sharing of this information unnecessary. This consolidation of data from the two business processes would address more than this specific data quality issue and would fundamentally change the “front end” business processing logic of FSA. It would affect the current CPS/FAFSA and COD systems most, and would also affect NSLDS and FMS internally as well as School and various Government agencies that validate applicant information externally.

An interim way to address this issue would be to implement a notification service either through a Message Oriented Middleware (MOM) solution or a deployed service that notifies the Application system when disbursement records are received. This business logic engine or service would receive a disbursement notification through a prescribed or published message service and then generate an update to the Application system. These messages could be received from the Origination and Disbursement system, or from an entity outside FSA through a gateway service. This option would result in impacts to the CPS system for receipt of the records as well as the COD and potentially SAIG systems for generation and (re)direction of messages.

Implementation of the first option, combining the Application with the Origination and Disbursement business process, is a large scale multi-year effort that would require modifications to the many “front-end” systems, most notably CPS and COD. This effort would require a great deal of communication with external parties, especially the School community.

Implementation of the second option has fewer large-scale impacts and is a potential interim solution to the specific data quality gap raised in this issue. It would still require modifications to the CPS, COD and SAIG (gateway) systems.



3. What business areas does this initiative impact?

The Application (CPS), Delivery (COD) and Institution Participation stages of the Lifecycle would be affected most. External Gateway (SAIG) processes would also be significantly affected by this initiative.

4. What additional data quality issues (if any) are addressed by this recommendation?

This recommendation will partially address the issue of automating and simplifying the process of linking the Pell Recipient File with the Abbreviated Applicant File for out year budgeting and planning. Through execution of either option outlined above, the disbursement results and applicant information would be accessible within the same system and the need for linking them would be alleviated. Budgeting and forecasting processes could simply use this single data source as input.

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000
(option 2)

>\$500,000
(option 1)

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months
(option 2)

>12 months
(option 1)

7. What are the impacts of not addressing this issue?

Wasteful production and distribution of ISIRs and other Application related correspondence to schools for students who are not attending their institution will continue. In addition, there will be a continued need for the reconciliation of applicant and recipient data between two different systems for the purposes of budgeting and forecasting outyear aid program funds.



Additional Comments

The solution suggested by option 1 has a multitude of benefits beyond the resolution of the specific data quality item raised by the Mad Dog team. The consolidation of the Application and Origination and Disbursement processes will create a single student data system for processing that precedes the servicing phase of the lifecycle. This will enable an integrated student view, a simplified application/award change process, an integrated Financial Aid Administrator view, simplified contracting, and many more beneficial enhancements. While both option 1 and 2 will address the quality issue, option 1 will also simplify a host of other business process inefficiencies.



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Data Quality Mad Dog Information

Mad Dog Issue Number: 6	
Business Entities Affected: Aid, School, Person	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

CPS is not always updated with FAA adjusted EFC calculations. Therefore, a student's financial aid package may not correspond with the student's eligibility as determined by CPS. Adjusting a student's Expected Family Contribution is, in effect, changing their eligibility for Title IV funds.

Financial Aid Administrators make changes to an applicant's Expected Family Contribution (EFC) calculation due to extenuating circumstances that cannot be communicated on the FAFSA. The Financial Aid Administrator, using professional judgment, can adjust one or more of the data elements used to calculate the EFC. It is important to note that an aid administrator cannot adjust the EFC formula, just the values that are used in the calculation.

Currently, schools have options for reporting EFC changes. If an FAA calculation results in a higher EFC, meaning the student is eligible for less Title IV aid, and the Pell award amount decreases, the school *must* report the EFC change to CPS. If only Campus-Based awards and Direct Loans are affected, the school can adjust/decrease the award amounts and is not required to report the new EFC to CPS.

If the recalculation results in a lower EFC, meaning the student is eligible for more Title IV aid, the school may either 1) report the changed EFC in order to disburse more Pell funds or 2) Retain the original EFC and award the original Pell amount. When the school decides to base the Pell award on the lower EFC, they must first report the change to CPS and wait to receive an adjusted ISIR document before making Pell disbursements. If only Campus-Based awards and Direct Loans are affected, schools may adjust/increase the award amounts without notifying CPS.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

Schools should always report adjusted EFC amounts to CPS. Since the CPS is FSA's central system for calculating and maintaining student eligibility information, it should be updated with FAA induced adjustments. As mentioned above, schools are only required to report EFC adjustments that will affect Pell award amounts. Currently schools can report these corrections and updates electronically through third-party software, EDExpress or FAA Access to CPS Online. When a school makes a correction electronically for a student, signed documentation for the correction from the student and parent must also be submitted to CPS.

Schools should report all EFC adjustments, including those that only affect Campus-Based and Direct Loan awards, using these methods. If this action is required, the number of EFC changes that will be reported to CPS is currently unknown. It was noted during the detailed analysis stage that because of recent updates, most notably electronic SAR distribution, CPS is more equipped to handle additional EFC changes from schools. In the past, when only paper SARs were distributed, requiring schools to submit all EFC changes and producing the SAR and ISIR documents to reflect these changes may have been too costly.

A larger scale solution than the one above, one that integrates the Application/Eligibility and Origination and Disbursement processes within FSA, is mentioned in Mad Dog Data Quality Issue #5. This recommended solution would make all origination and disbursement information, including adjusted EFC amounts, available to the eligibility business logic. With this solution, sharing of information between CPS and COD would be unnecessary because the two business processes would be integrated. As noted in issue #5, this consolidation of these business processes would address more than this specific data quality issue.

Implementation of the second solution, combining the Application with the Origination and Disbursement business process, is a multi-year effort that would require modifications to the many systems, most notably CPS and COD. This effort would require a great deal of communication with external parties, especially the School community.

Implementation of the first option is a potential interim solution to the specific data quality gap raised in this issue. It would still require modifications to the CPS, COD and SAIG (gateway) systems. Although requesting that schools report all EFC changes to CPS and preparing CPS to receive these changes can be done in a moderate time frame, *requiring* that schools report these changes cannot. Requiring schools to report all EFC changes, not only those affecting Pell awards, constitutes a change in policy, which can only be done over an extended period of time.



What business areas does this initiative impact?

The Application and Delivery/ Origination and Disbursement are impacted Lifecycle Stages / business processes. Systems and entities impacted are CPS, COD, FAA Online, EDE (EDEExpress), Trading Partners/Schools

3. What additional data quality issues (if any) are addressed by this recommendation?

This recommended solution is tied to the recommended solutions to Data Quality Mad Dog Issue #5, specifically, the integration of the Application business process with Origination and Disbursement. Combining these two business processes would eliminate the disjoin between the eligibility information held in CPS and the school adjusted eligibility information used to establish the actual awards disbursed to students.

4. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000
(Option 1)

\$100,000 - \$500,000

>\$500,000
(Option 2)

5. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months
(Option 1 or 2)

6. What are the impacts of not addressing this issue?

FSA's ability to reconcile between eligibility established in CPS, calculated with the data received on the FAFSA, and the actual awards, as reported to COD and disbursed by schools, will remain an issue. Reconciling these differences is often difficult, time consuming and costly. When eligibility information is recalculated by schools and not reported back to FSA, a gap is created. CPS will not always contain the most up to date eligibility information. CPS relies heavily on this information for analysis, budgeting, and forecasting purposes.



Additional Comments

It was noted that FSA is exploring the option of developing a Web Service tool for EFC calculations. This would help to ensure that Financial Aid Administrators use the correct EFC formula when performing recalculations. If implemented to include the appropriate functionality, this Web Services tool may eventually be used by schools to report EFC changes to FSA.



Contact Information

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Data Quality Mad Dog Information

Mad Dog Issue Number: 8	
Business Entities Affected: Financial Partner / Schools	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

There are no means within FSA to identify a Trading Partner Institution (School, Lender, Servicer, GA, etc.) and all of their current and historical relationships to other entities so that data from multiple stores within FSA can be aggregated for viewing or research. Further complicating the landscape, identifiers from bodies outside FSA such as the Data Universal Numbering Scheme (DUNS), Taxpayer Identification Number (TIN), and the Integrated Post Secondary Education Data System (IPEDS) number are used to support specific business process requirements within FSA. This has resulted in a lack of a consistent manner in which to identify trading partners across the FSA enterprise, regardless of system. Instead, trading partners are put in a situation of identifying themselves to FSA using different identifiers depending on the business process or system.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

The recommended solution is the implementation of the Routing Identifier (RID). The Routing ID (RID) will provide a single, cross-system, common identifier for every trading partner regardless of trading partner affiliation, ownership structure, or type of interaction with FSA.

There are a number of possible RID implementation solutions. Based on the results of the RID Implementation Options Analysis (deliverable 123.1.24), the current recommendation is to incorporate the RID into the Integrated Partner Management (IPM) Solution. The IPM Solution is envisioned as the future state entry point for new trading partners within FSA's business process life cycle. This option allows the first system in the processing life cycle to capture and maintain the trading partner's RID.

IPM is currently in the early stages of the visioning and conceptual design. If the IPM concept proceeds forward as part of FSA's future state vision, the recommendation is to incorporate RID within IPM. Under this scenario, IPM can be developed as a new Commercial off the Shelf (COTS) solution. If the IPM Solution does not move forward as part of the target state vision, a Common Origination and Disbursement (COD) Based Solution should be strongly considered for enterprise deployment of RID (For a detailed list of all the implementation options refer to the deliverable 123.1.24 - RID Implementation Options Analysis).

The solution and scope of this work is dependent upon the implementation option that FSA selects for the RID vision. Currently the deliverable (123.1.25 - RID High-Level Design) that will detail this implementation option is due 11/17/03.



3. What business areas does this initiative impact?

The RID solution will touch every system in all the Lifecycle stages. Most affected will be Delivery and Institution Participation, including COD, NSLDS, FMS, PEPS during processing for Trading Partner Application, Origination and Disbursement, and Oversight.

4. What additional data quality issues (if any) are addressed by this recommendation?

This issue is closely related Issue 3 (There is no enterprise way to uniquely identify a loan - common Loan ID) as parallels can be drawn behind the benefits of standardizing entity identifiers. Additionally, issue 11 (There is no ability to pull data from systems across the lifecycle to present a single, integrated student view complete with current status of a student's aid and "workflow" indicators relative to that student) is applicable to common viewing of a trading partner life cycle through FSA.

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

The process of aggregating a “parent” institution’s statistics (to include all campuses, additional locations, administrative sites, etc.) will remain a manual, time consuming process that, at times, is entirely reliant upon several FSA experts who happen to know about an institution and its relationships to other entities. This process is a data quality issue as incorrect data, lack of data, or the timeliness of data may cause additional issues. Additionally, the various identifiers for institutions do not sufficiently capture the effective relationships of these entities as they change over time, therefore, program analysis and oversight will continue to be hindered.



Additional Comments

N/A



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Data Quality Mad Dog Information

Mad Dog Issue Number: 10	
Business Entities Affected: Person	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

Records submitted to FSA systems with incorrect identifiers can result in the creation of an invalid student/borrower. While the systems have varying logic and exceptions, there often is a 'first come first serve basis' standard. This condition affects the ease of downstream systems to update the record with the correct identifiers. This can occur at any 'entry point' to FSA including CPS, COD, DLCS, DMCS, PIN, and NSLDS.

Changes to a customer's identifying information currently are not communicated to all necessary phases of the lifecycle; all systems should be able to send and receive such changes. It is not necessary to communicate every change to every system in every instance; however, such a capability must exist to ensure that important changes are communicated accurately.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

The first step in addressing this issue is to reduce the number of occurrences where invalid identifiers are being created. This can be accomplished by implementing SSIM, performing an SSA match, and by better educating the schools and students.

- Of the Person Business Entity 'entry points' to FSA, CPS and PIN are currently the only ones that perform a SSA match. It is recommended that COD, DLCS, DMCS, and NSLDS also perform the match for identities that have not yet gone through a SSA validation.
- Resources should be devoted to a campaign that emphasizes and cautions schools about the data integrity benefits of a common identification method (SSIM) and the processing of good data, with valid SSNs, etc.
- FSA resources should communicate with the borrowers regarding the importance of submitting valid, correct data the first time, to avoid problems with processing aid. . (e.g. A message could be included on the paper and web applications for aid (FAFSA, PLUS Application, etc.).

Once the Person Business Entity is within FSA there need to be controls in each system as to when the Person's identifiers (SSN, Name, and Date of Birth) can be updated. The following are the suggested verifications required for SSN changes:

1. Submission of a valid Social Security Card or Drivers License that displays the Social Security Number.
2. Receipt of a successful SSA match (match flag of 4).
3. Change request received from a data provider who requires similar credentials.

And the following are the suggested verifications required for Name and Date of Birth changes:

1. In the instance of a name change, proof of a marriage license, divorce decree, or legal name change document.
2. Change request received from a data provider who requires similar credentials.
3. Date of Birth corrections do not require additional documentation.

When there are changes to the identifying information, they must be communicated to all relevant systems at the time of receipt. To enable the most accurate change information, the communication of such identifier changes should include:

- Original or previous SSIM data
- Corrected or revised SSIM data
- Date/time the change was received
- Source of the change request

The last step in resolving this issue is to use the Person Entity Flow to identify the various touch points across the enterprise and to establish a common identifier process for validating/resolving identifier conflicts. Using SSIM and SSA as a basis, unsuccessful or partial matches should be sent to relevant systems for notification and exception processing.



3. What business areas does this initiative impact?

The Lifecycle Stages affected by this issue include Application, Delivery, and Servicing . This issue is present in the FSA systems which store information regarding the Person Business Entity: CPS, NSLDS, COD, OCTS 2.0, DLSS, CDDTS, DLCS, DMCS, DLDM, and CMDM.

4. What additional data quality issues (if any) are addressed by this recommendation?

Mad Dog Issue #11 *"There is no ability to pull data from systems across the lifecycle to present a single, integrated student view complete with current status of a student's aid and "workflow" indicators relative to that student."* Establishing a SSIM and ensuring it is consistent throughout the enterprise will support this single, integrated student view.

Mad Dog Issue #24 *"There is currently no SSA or INS validation (to verify SSN and citizenship) for Plus Borrowers. This can result in the lending of Title IV funds to an ineligible borrower."* As mentioned in the recommendation, SSA validation is the first step to reduce the number of occurrences where invalid identifiers are being created

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

Lack of enterprise-wide ID standards enables identification errors:

- Unique customer records can be inappropriately merged creating privacy concerns.
- A customer's records cannot be linked accurately preventing FSA from viewing data about a customer across all phases of the life cycle.

Senior FSA leadership has created a performance plan with several action items designed to take FSA off the GAO High-Risk List. Action item 16.2.2 states the need to "Develop requirements and initial design for Common Identifiers for Schools, Students. " Without addressing this issue there is the risk that FSA may remain on the GAO High-Risk List. SSIM is a current project under the Data Strategy task order that is addressing action item 16.2.2.



Additional Comments

Duplicate record logic within FSA needs to be updated to allow a student with loans to 2 institutions in the same time period. This occurrence is now very possible due to the distance learning program. This should be further researched by both the RID and SSIM teams.

The highest incidence of identifier match issues is with DMCS updates.

As part of the Data Strategy initiative, the Standard Student Identification Method (SSIM) team is examining the FSA identifier problems presented in this issue in greater detail. The SSIM team delivered a High Level Design in May 2003. The recommendations from the High Level Design are reflected in this issue analysis. The SSIM team is currently creating an Implementation Approach that will detail the potential methods to alleviate the identifier issues. The Implementation Approach Deliverable is scheduled for completion in September 2003. There are a number of items collected from Focus Group and other SSIM meetings that will be further researched and incorporated in the deliverable (e.g. Terrorist Database check, enforce PLUS borrowers to use FAFSA, etc.).



Contact Information

Date:	7/16/03
Author(s):	Jeanne Saunders, Larry Parker, Allen Prodggers, Dwight Vigna, John Brooks
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Data Quality Mad Dog Information

Mad Dog Issue Number: 11	
Business Entities Affected: Person	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

There is no ability to pull data from systems across the lifecycle to present a single, integrated student view complete with current status of a student's aid and "workflow" indicators relative to the student. There is no way to link other forms of aid (Title III, TRIO, Upward Bound) to FSA aid. This impairs FSA's ability to:

- Provide complete customer service
- Perform comprehensive program analysis
- Perform comparative analysis at the student level



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

Implementation of the Standard Student Identification Method should enable the linkage between a person's aid records within the FSA enterprise necessary to present the integrated student view. The business architecture (i.e. data warehouse or central repository), design and the tool set needed to present an integrated student view will need to be implemented as well.

Dependencies:

- Common Student Identifier
- Portal Strategy
- Access Management



3. What business areas does this initiative impact?

Because this issue pertains to borrower information it affects all points touched by the Person Entity. Thus, the Lifecycle Stages affected are Application, Delivery, Institution Participation and Servicing. Because the Person is in all systems, all systems will be affected as well

4. What additional data quality issues (if any) are addressed by this recommendation?

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

- Inquiries and problem resolution will still require additional system look ups
- Customers will need to contact additional call centers to receive answers to questions that require access to multiple systems.
- FSA will continue to send ISIRs to “non-attending institutions” in the case of renewal applications. For example, when a second year student at an institution that has yet to report enrollment submits a renewal application (FAFSA), all schools listed on the original FAFSAA may receive the renewal ISIR since CPS does not know which school the student is attending.
- FSA will forego the opportunity to simplify program analysis.
- Identifying the most current or alternative addresses for students/borrowers will require multi-system access. This is particularly a burden in collections and servicing.
- Verification selection will be based upon incomplete information.
- Oversight of schools will remain a labor intensive process (for Case Management and Oversight)



Additional Comments

There may be many obstacles in implementing the integrated student view. FSA's current systems architecture may not be conducive to implementing an integrated student view and providing it to users with an acceptable response time. Although the EAI Bus and SSIM (when implemented) are enablers, an ideal approach would be to build systems with concepts such an integrated student view as part of the conceptual design and requirements.



Contact Information

Date:	7/16/03
Author(s):	Allen Prodggers, Dwight Vigna, Rhonda Singleton
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Data Quality Mad Dog Information

Mad Dog Issue Number: 14	
Business Entities Affected: School, Person, Aid	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

The accuracy and consistency of Enrollment status information is not high within FSA systems. Enrollment data includes Current Status (Full/Half Time Student), Withdrawn, Anticipated Completion Date and PLUS 2nd Disbursement date. These values are important to all phases of the lifecycle as they are key indicators for servicing, default rate calculations and analytic functions of FSA. Inaccurate information creates flawed metrics and research indicating the "success of the program" mission.

The effected systems, COD, DLSS and NSLDS all collect and handle the information differently. Listed below are the different methodologies for handling "PLUS 2nd Disbursement Date" and "Anticipated Completion Date" data.

PLUS 2nd Disbursement Date:

Currently the 2nd disbursement date is not a required field on the XML common record. Because repayment is set for 60 days after final disbursement, borrowers are improperly entering repayment 60 days after the 1st disbursement, the only date provided.

The accuracy of Anticipated Completion Date information was also indicated as a high priority portion of this issue. The research for this report has found that COD has already implemented a solution to ensure more accurate information. COD makes a calculation to determine the date. This information is passed on to DLSS and then NSLDS.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

As mentioned, the anticipated completion date portion of this issue has been resolved as follows

“The anticipated completion date field will be removed as a required field in the Loan Origination Record. Schools will no longer be required to populate the Anticipated Completion Date in the school software. Loan Origination will automatically calculate the date based in the borrower’s program length and year in college. Schools tend to set the academic completion date by award year rather than when the borrower will actually complete study. The servicing system then prematurely puts the borrower into repayment. This problem has been happening since the inception of the program.”

In order to prevent PLUS borrowers from entering repayment too soon, a work around has been implemented to estimate the 2nd disbursement date. The date is calculated as the point half way between the 1st disbursement and the end of the loan period. However, because this work around is only an estimate, borrowers could still enter repayment too soon or too late. As such, it is recommended that the 2nd disbursement date be made a required field on the XML record. This enhancement is currently being recommended as part of the '04 Common Record implementation.

3. What business areas does this initiative impact?

Lifecycle Stages impacted by this issue are Application, Delivery, Servicing.
Systems impacted include NSLDS, COD, DLSS, FSA Analysis

4. What additional data quality issues (if any) are addressed by this recommendation?

N/A



5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000 **\$50,000 - \$100,000** \$100,000 - \$500,000 >\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months **3-6 months** 6-12 months >12 months

7. What are the impacts of not addressing this issue?

Not addressing this issue will allow for reporting/analytics to be run with inaccurate information. If the Anticipated Completion Date or a PLUS 2nd disbursement date are incorrect, other derived data fields within FSA systems will also be incorrect:

- Repayment begin dates,
- Default rate calculations,
- School performance/graduation rates, success of their programs
- Participation Management

Additional Comments

N/A



Contact Information

Date:	7/14/03
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Data Quality Mad Dog Information

Mad Dog Issue Number: 20	
Business Entities Affected: School and Aid	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

GAPS and FMS receive and/or process school identification status and eligibility data updates at different times. This can result in errors being returned from GAPS to multiple systems to which GAPS sends updates (COD, FMS, etc.) This impacts a schools ability to draw money in GAPS. The frequency of these errors has been reduced to perhaps one occurrence per week; however, the effort to resolve the errors is significant and requires coordination across operations and systems (PEPS, FMS, GAPS, EDCAPS RS) groups.

Updating eligibility status and DUNS numbers in GAPS and PEPS is a manual process. New school grantee DUNS updates and TIN updates are sent via email to GAPS. FMS receives a daily feed from PEPS, but FMS does not update daily, therefore, DUNS number mismatches occur.

The Department of Education is made aware of DUNS number changes through two methods, either schools notify ED (OCFO) that their grantee DUNS number has changed or the DUN and Bradstreet Service sends a feed to the Recipient System (RS) of EDCAPS. OCFO sends requests for updated DUNS numbers on a quarterly basis. When a school notifies OCFO, an email notification is sent to FMS and PEPS staff. The notification triggers manual updating processes in those systems. When the change is received via the feed from the DUN and Bradstreet Service, the Recipient System is updated and instantly updates GAPS (real-time), however, notification to FSA is not automated. Either way, there is a period of time in which FSA systems are not updated. In this scenario, COD may continue to receive records that appear on the GAPS Feeder System Error file from GAPS when the DUNS number doesn't match (error #7 or #13), indicating that the grantee DUNS number is missing or invalid. This error prevents schools from drawing funds. COD staff looks in GAPS to see if the DUNS number has changed, and if so, COD is manually updated.

If the DUNS number is missing, (no grantee DUNS in GAPS), FSA staff determine if there is an



OCFO update in progress, if not, Title IV Delivery (Jay R. Long) is notified, and informs Case Management and Oversight who then contact the school to receive the DUNS number. When the DUNS number is received, Title IV Delivery makes the update in PEPS.

When a Change of Affiliation, the DUNS number of the purchased school changes to the DUNS number of the purchasing institution. Updates made in GAPS and PEPS are manually processed as described above. There are issues related to the timing of the updates that may impact records in process. There were thirty-nine Changes of Affiliation in the 01-02 award year. These changes involve hundreds of campuses, potentially thousands of students, and hundreds of staff hours across various offices in the Department that are identified in Item 7 below.

The group also questions why FMS tries to match the DUNS coming in from COD to the DUNS in FMS and recommends this check no longer be run.

2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

1) Implement interfaces:

- From PEPS to OCFO (GAPS) providing the Daily School File. This will provide new school set up data to GAPS electronically if GAPS reads the change records related to a new school set up or change of affiliation (changed DUNS number). OCFO may find other updates to a schools demographic and participation information helpful as well. OCFO may also want these changes posted to the Recipient System.
- From OCFO (GAPS) to PEPS so that PEPS may receive changes to grantee DUNS numbers electronically. PEPS would then provide updates to the FSA enterprise.

2) Implement daily processing of the PEPS School File by FMS. FMS currently has an outstanding Change Request (CR) to fix this issue. A new sweep code is currently being tested. This code will apply the school file to all of the programs and should ensure FMS incorporates all aspects of the PEPS file. FMS also has an outstanding CR that has not yet been approved which recommends the DUNS number no longer serve as a validation field for incoming COD records.

Dependencies:

- Case Management Process Reengineering via eCMO
- PEPS Reengineering/Replacement via development of Trading Partner Management System.



3. What business areas does this initiative impact?

Life Cycle Stages impacted by this issue are Institution Participation and Delivery. Effected systems are COD, PEPS, FMS, GAPS

4. What additional data quality issues (if any) are addressed by this recommendation?

NA

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

Title IV Operations and CFO will not routinely receive timely updates.

EDCAPS (RS, GAPS, FMSS) – Resolution of mismatched ID's (DUNS) is costly (time consuming, labor intensive, and prone to data entry (same at FSA). Involves CMO PEPS, Pell Ops, Direct Loan Ops, Campus-Based Ops, FSA CFO, OCFO, and COD Systems FSA and contractor staff.

Impact of not removing FMS (FSA) edit on DUNS numbers received within COD transactions is that disbursements/adjustment records to funding may be delayed unnecessarily when a record with a changed DUNS are received.



Additional Comments

Currently, eligibility (HCM 1 & 2, Reimbursement, and Stop Pay) is a manual update by FSA Reimbursement Analysts to GAPS and new school grantee DUNS updates and TIN are in the form of an email to GAPS. FMS gets a daily feed from PEPS but they don't update daily.

Response to question # 6 assumes that this will not be done by itself but built into a Trading Partner Management System, otherwise, the proposed solution may be implemented more quickly.



Contact Information

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Data Quality Mad Dog Information

Mad Dog Issue Number: 21	
Business Entities Affected: Aid & Financial Partner	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

Currently FMS only sends internal system interface error reports to COD. While FMS does capture errors in its processing regarding all system interfaces, these errors are not returned via a standard return file process, and the "feeder" systems do not process the errors (except for COD). 90% of the errors are technical issues and not easily resolved by the "feeder" system. Thus, the current process is for FMS to monitor and work the errors. Many of the remaining errors are user related consisting of changes to the format, header/trailer, or simply human error. For these cases, system owners are walked through necessary revisions. Immediate example is the accounts payable file sent from DLSS to FMS. There is no error file returned to DLSS indicating whether payments were processed successfully. System owners can run a report and find out that a file did not process but it is a detective activity rather than a more proactive approach

There are data transfers between FMS and COD LO, Legacy LO, DLCS, DMCS, DLSS, NSLDS, Pell, eCB, GAPS, and GA Forms Loading internally and External Trading Partners/Lockbox and SLMA externally. Although actual error reports are not generated, there is a monitoring process for all of the transfers. The following is a breakdown of all of the interfaces' error monitoring processes:

- Currently COD receives a transaction level "data error response transaction" that updates the COD system with the error information. FMS runs a report two times per week and works the errors.
- For Legacy LO and DLCS, FMS generates a Control and Error report during the regular processing of LO and DLCS transactions. The report is reviewed by FMS to confirm that there were no transaction errors.



- DMCS transactions generate Fail Alerts when a transaction fails. The system sweeps for errors and generates an Oracle Alert notice indicating processing errors. FSA CFO receives this report and requests FMS to review.
- For Pell transactions Oracle Alerts are generated when the load fails. It is sent to FSA and FMS consultants for review.
- For eCB, FMS consultants review a Transaction Log for errors after scheduled files are received, and make any necessary fixes.
- Within the GAPS interface there are two types of data transfers that occur. Files sent from FMS to GAPS and files from GAPS to FMS. Files sent to FMS from GAPS go into a GL Interface table. If processed properly, these transactions are sent to the feeder system, otherwise it stays in the GL Interface table and a subsequent alert indicates "File Name X is in error." This issue is then worked by consultants within FMS.
- For data that is being sent from a feeder system to GAPS via FMS, FMS receives the file and generates a Control and Error report and processes data over to the outbound file. Once FMS reviews the Control and Error report to verify that the information was received and went out properly, they (FMS) send an email to GAPS advising of the data transactions that were sent and request a confirmation of receipt. GAPS verifies it has received the transactions and sends a response email indicating that all the transactions were received properly.
- The error processing for NSLDS quarterly LPIF and AMF transactions is manual. Any errors are usually formatting errors consisting of incorrect naming conventions or header/footer changes. FSA CFO will notice that they have not received the scheduled information and they request FMS to review. FMS consultants review the transaction log for specific transactions.
- An Error & Control Report is generated for the DLSS interface. If there is an error in processing the transaction, Oracle sends an email to FMS and the error is worked by FMS personnel.
- Transfers with Lenders and the Lockbox entities are handled in the same fashion as NSLDS. Any errors are usually formatting errors consisting of incorrect naming conventions or header/footer changes. FSA CFO will notice that they have not received the scheduled information and they request FMS to review. FMS consultants review the transaction log for specific transactions.



- SLMA sends information in monthly, quarterly and annually. FMS then posts the results of the information to the forms 2000. SLMA knows the schedule and checks to see if the information is posted. If not they contact FMS. Essentially, the error processing is done by the "feeder" system, who notifies FSA that there is an error that requires correction at FMS.
- Guarantors go into Forms 2000, an FMS system extension, to input their monthly, quarterly and annual report data, the form is then loaded for processing. If errors are generated during the attempt to load they are stored in the program log, but nothing happens until the Guaranty Agency contacts FMS Operations and asks them to research the issue.

2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

Rather than a request system to detect errors, utilize current Oracle Alert and Report system more completely.

The Oracle system generates a Log Report for all programs executed in FMS. The log report is available to all users submitting requests as well as the System Administration Users. Oracle has the ability to generate reports and send alerts and emails with varying levels of detail to an assigned individual or group. The assigned would be advised that a file had errors that prevented successful processing. Oracle Batch Level Alerts advise that 'items from this batch failed'. These alert message recipients can be determined by the nature of the error. Mapping errors should be resolved within FMS and data quality issues should be addressed by the system owners

Oracle can send a message that will advise the system owner how to make necessary process changes when the error is not technical. When the issue is technical, Oracle can send an email with transaction details included.

Initial reaction might be to generate reports back to the system owners for resolution; however, depending on the types, errors might be more efficiently resolved within FMS with advice or simple notices going out to the systems for quality control audit purposes. Transaction errors versus data quality errors might be too technical to be resolved by the systems and could cause a delay in resolution and processing.



3. What business area(s) does this initiative impact?

Lifecycle Stages affected this initiative include Application, Delivery, Institution Participation and Servicing.

The specific systems impacted are GAPS COD LO, Legacy LO, NSLDS, eCB, Pell, DLCS, DLSS, DMCS, Lender/Lockbox, Guarantors/Forms Loading, Financial Partners

4. What additional data quality issues (if any) are addressed by this recommendation?

N/A

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

If there is a standardized error reporting and resolution function there would be a reduction in duplicate effort, transaction response time and processing delays. It would also prevent duplicate payments and increase internal controls. The effect would be much more cost effective.



Additional Comments

N/A



Contact Information

Date:	7/14/03
Author(s):	Nate Brown, Rosemary Beavers, Jeanne Saunders
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Data Quality Mad Dog Information

Mad Dog Issue Number: 24	
Business Entities Affected: Person (Borrower)	Is this a "Quick Hit" (Y or N): N

1. Please indicate a general description of the data quality issue:

A) The award of Title IV Aid to a student borrower requires the submission of a FAFSA and therefore subjects that borrower to, among other things, a verification of Social Security Number (SSN) by the Social Security Administration (SSA) and potentially citizenship verification by the Immigration and Naturalization Service (INS). However, parent borrowers desiring to receive a Parent Loan for Undergraduate Students (PLUS), either through the Direct Loan or FFEL Program, do not pass through this same validation, nor do the students for whom the PLUS loan funds are borrowed if they did not submit a FAFSA. This can result in the lending of Title IV aid to an ineligible borrower. FSA, as well as the School community, would like to establish a process for executing these validations to eliminate this possibility.

B) In addition to this PLUS verification, there is also a desire for all borrowers to be passed through verifications pursuant to the USA PATRIOT Act. This would mean that all FAFSA applicants and borrowers would be subject to additional verifications and screenings associated with the USA PATRIOT Act.



2. Please indicate a general description of the recommended solution, related scope of work and dependencies?

To address issue "A" above, it is recommended that FSA create a common service through which a borrower can be submitted for verification by SSA, INS and other Federal Agencies with which a check is required. In the short term this service could be provided from the current executer of these validations, the CPS system. As this service takes on additional volume and users, in the form of additional systems, this service should be decoupled from a CPS and integrated into the SSIM solution.

In order for this service to be successful it will also require the creation of a process for obtaining key identifying information for all aid recipients including PLUS borrowers, either through the completion of a FAFSA or an alternative form. Isolating this service as a piece of business logic that is accessible by multiple parties reduces the redundancy of maintaining business logic in multiple places and increases the consistency with which verifications are performed.

Issue "B" above can be achieved by adding another process to the service designed to address issue "A". In practice, any additional verification, whether it targets the USA PATRIOT Act or a standard credit check, can be added to the service engine and then triggered through the use of indicators for the various types of verifications required by the subject request.

Decoupling the various agency verification processes from the Application process for access by multiple systems has the largest impact to the current CPS system. The impact to the COD and external user community is their need to create an interface or call to the new service. These modifications can be performed in a phased manner over a period of time to lessen the impact to the CPS and COD systems.

Modifications to the Application process to include USA PATRIOT Act verification will also involve regulatory changes and at the very least mean a major impact to the Application and Origination and Disbursement business processes. As a result, these changes would likely require a multi-year implementation plan.



3. What business areas does this initiative impact?

The Application (CPS), Delivery/Origination and Disbursement (COD) and External Gateway (SAIG) processes would be most affected by this initiative. Schools and the Financial Partner community would also be affected by the need to verify all PLUS borrowers.

4. What additional data quality issues (if any) are addressed by this recommendation?

In addition to extending the verification of eligibility to all Title IV Aid borrowers these new edits would reduce potential waste, fraud and abuse of funds, a key step toward removal from GAO High Risk List designation.

These solution options also have an impact on the SSIM solution being proposed as part of the Overall Data Strategy effort, and on recommendations to address Data Quality Mad Dog issue numbers 10 and 11. These two issues address the identifier mismatch problems experienced by multiple systems updating key person identifiers and the desire for an integrated student view presented from an enterprise level respectively. As mentioned in the recommendation section of this document, the SSIM solution is a logical place to incorporate verification logic in support of addressing this issue.

5. What are the estimated costs of the initiative? (choose one)

\$0 - \$50,000

\$50,000 - \$100,000

\$100,000 - \$500,000

>\$500,000

6. What is the estimated time required to implement? (choose one)

0 – 3 months

3-6 months

6-12 months

>12 months

7. What are the impacts of not addressing this issue?

Title IV Aid will continue to be disbursed to ineligible borrowers. This opportunity to continue waste, fraud and abuse will remain vulnerable.

Customer records may not be able to be linked accurately, due to invalid or incorrect identifiers, preventing FSA from viewing and analyzing data about a customer across the enterprise.



Additional Comments

N/A